

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. __

**ORDER SUSTAINING DEBTORS' ONE HUNDRED FORTY-THIRD
(NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN
CLAIMS FILED AGAINST THE INCORRECT DEBTOR**

Upon the one hundred forty-third omnibus objection (the “Objection”)² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) sustaining the Objection and modifying the Incorrect Debtor Claims set forth in Schedule 1 and Schedule 2 attached hereto; and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Incorrect Debtor Claim set forth in Schedule 1 and Schedule 2 attached hereto is modified in its entirety. The claims listed in the column titled “Modified Claims” identified on Schedule 1 and Schedule 2 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover is preserved.
4. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Incorrect Debtor Claims referenced or identified in the Objection that is not listed on Schedule 1 and Schedule 2 attached hereto.

5. To the extent a response is filed regarding any Incorrect Debtor Claim, each such Incorrect Debtor Claim, and the Objection as it pertains to such Incorrect Debtor Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Incorrect Debtor Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtor may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtor pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or

causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
Chief United States Bankruptcy Judge

SCHEDULE 1

Incorrect Debtor Claims

FTX Trading Ltd. 22-11068 (JTD)
 One Hundred Forty-Third Omnibus Claims Objection
 Schedule 1 - Incorrect Debtor Claims

		Asserted Claims	Modified Claim
Claim Number	Name	Debtor	Debtor
97584	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
98143	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97425	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97282	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97407	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
94877	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97132	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
98183	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97705	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
98138	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97281	Name on file	FTX EU Ltd.	FTX Trading Ltd.
98020	Name on file	FTX Trading Ltd.	Quoine Pte Ltd
97039	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
96891	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97590	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
96954	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97068	Name on file	FTX EU Ltd.	FTX Trading Ltd.
98146	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
96893	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
98205	Name on file	FTX EU Ltd.	FTX Trading Ltd.
95127	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97368	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
98137	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97311	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97462	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97626	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97479	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
98035	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
98203*	Name on file	FTX EU Ltd.	FTX Trading Ltd.
97374	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97207	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97963	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97591	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97356	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97355	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
98128	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
98093	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97010	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97259	Name on file	FTX EU Ltd.	FTX Trading Ltd.
97477	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97518	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
98207	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
40188	Name on file	FTX EU Ltd.	FTX Trading Ltd.
97975	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97362	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
96389	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
96858	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97273	Name on file	FTX EU Ltd.	FTX Trading Ltd.
93355	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97357	Name on file	FTX EU Ltd.	FTX Trading Ltd.
97554	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97568	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97384	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97657	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97376	Name on file	FTX EU Ltd.	FTX Trading Ltd.
97394	Name on file	FTX EU Ltd.	FTX Trading Ltd.
96937	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97570	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97483	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
96984	Name on file	FTX EU Ltd.	FTX Trading Ltd.

SCHEDULE 2

Incorrect Debtor Claims

FTX Trading Ltd. 22-11068 (JTD)
One Hundred Forty-Third Omnibus Claims Objection
Schedule 2 - Incorrect Debtor Claims

<u>Asserted Claims</u>			<u>Modified Claim</u>
<u>Claim Number</u>	<u>Name</u>	<u>Debtor</u>	<u>Debtor</u>
85023	Name on file	West Realm Shires Financial Services Inc.	West Realm Shires Services Inc.
96622	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97575	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
2316	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
207	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
31313	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
96834	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
82753	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
82376	Name on file	West Realm Shires Services Inc.	FTX Trading Ltd.
95284	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
15115	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
96636	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
459	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
5722	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
27944	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
79766	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97471	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
59742	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
15396	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
92	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
82637	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
47373	Name on file	FTX EU Ltd.	FTX Trading Ltd.
97309	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
1605	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
83529	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
94832	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
649	Name on file	FTX US Trading, Inc.	West Realm Shires Services Inc.
24673	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97239	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
12177	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
80828	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
32784	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
95106	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
96382	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
1021	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
21875	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
317	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
2407	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
76117	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97460	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
96347	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
94635	Name on file	FTX EU Ltd.	FTX Trading Ltd.
1733	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
17945	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
2224	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
82923	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
95091	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
96767	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
2952	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97533*	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
1289	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
1694	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
535	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
79759	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
79733	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97216	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.

97533*: Claim is also included as a Surviving Claim in the Debtors' One Hundred Forty-First (Non-Substantive) Omnibus Objection to Certain Superseded Proofs of Claim (Customer Claims)

<u>Asserted Claims</u>			<u>Modified Claim</u>
Claim Number	Name	Debtor	Debtor
310	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
95333	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
28172	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
43138	Name on file	FTX EU Ltd.	FTX Trading Ltd.
1106	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
95165	Name on file	FTX EU Ltd.	FTX Trading Ltd.
1506	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
3280	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
65983	Name on file	West Realm Shires Services Inc.	FTX Trading Ltd.
94970	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
73026	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
56800	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
532	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
96932	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
1239	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
70596	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
1234	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
2787	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
97403	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
95119	Name on file	FTX EU Ltd.	West Realm Shires Services Inc.
5765	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
158	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.
2345	Name on file	FTX Trading Ltd.	West Realm Shires Services Inc.